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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**L.R. 6-2 STIPULATED REQUEST TO  
EXTEND DEADLINE TO COMPLETE  
EXPERT DISCOVERY AND  
[PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

**STIPULATION**

Plaintiffs Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

**RECITALS**

WHEREAS, the close of expert discovery in this matter is currently scheduled for March 27, 2025 (ECF No. 162);

WHEREAS, by operation of Local Rule 37-3, the current deadline for any Party to file a non-*Daubert* motion related to expert discovery is April 3, 2025 (ECF No. 162);

WHEREAS, under the Court’s January 27, 2025 Order (ECF No. 164), separate briefing deadlines were set for *Daubert* motions;

WHEREAS, the Parties have agreed to extend the deadline to hold expert depositions by 12 days, from March 27, 2025 to April 8, 2025; and

WHEREAS, for the reasons set forth in the attached Wallenstein Declaration, the parties jointly agree that good cause exists to grant the extension of time to hold expert depositions, including because: (1) the schedules of the expert witness deponents and responsible attorneys required finding additional dates beyond the deadline when all necessary parties would be available; (2) the parties have been engaged in briefing of class certification in this case, as well as briefing in the related *Csupo* case in state court, that created additional conflicts with scheduling these depositions; and (3) the technical nature of these experts’ opinions necessarily requires additional time to analyze their reports and prepare for deposition questioning.

**NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and agree that:

- The deadline to complete expert depositions shall be extended from March 27, 2025 to April 8, 2025; and
- By operation of Local Rule 37-3, the deadline for any Party to file a motion related to expert discovery shall be April 15, 2025 (this does not include *Daubert* motions,

which have separate deadlines set by this Court's January 27, 2025 Order, ECF No. 164).

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Dated: March 28, 2025

Dated: March 28, 2025

COOLEY LLP

KOREIN TILLERY LLC

/s/ Whitty Somvichian

/s/ Marc A. Wallenstein

Whitty Somvichian (194463)

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*Attorney for Defendant  
Google LLC*

*Attorney for Plaintiffs*

**ATTESTATION IN CONCURRENCE OF FILING**

I, Chad E. Bell, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that all other signatories listed have concurred in this filing.

Dated: March 28, 2025

/s/ Chad E. Bell

Chad E. Bell (*pro hac vice*)

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

Virginia K. DeMarchi

United States Magistrate Judge